

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

THE TRUSTEES OF  
PURDUE UNIVERSITY,

Plaintiff,

v.

STMICROELECTRONICS  
INTERNATIONAL N.V. and  
STMICROELECTRONICS, INC.,

Defendants.

Civil Action No. 6:21-cv-00727-ADA

JURY TRIAL DEMAND

**NOTICE REGARDING PLAINTIFF'S SUBPOENA TO X-FAB TEXAS, INC.**

As the Court is aware, Plaintiff The Trustees of Purdue University ("Purdue") seeks subpoenaed documents and deposition testimony from General Electric Company ("GE" or "General Electric"). *See* Dkts. 163, 172, 173, & 182. GE is a foundry customer of X-Fab Texas, Inc. ("X-Fab"), a wafer manufacturer that Purdue subpoenaed in relation to GE's products. Dkt. 182 at 4 n.5. However, X-Fab has objected and continues to assert that "any information that X-Fab has relevant to the instant litigation can be supplied by General Electric." Dkt. 182, Exhibit C (November 8, 2022 letter from X-Fab's counsel in response to Purdue's subpoena); *see also* November 23, 2022 from X-Fab's counsel, which is attached hereto as Exhibit 1 (arguing that the requested "information can be more conveniently obtained from another source – General Electric Company"). X-Fab's continued refusal to provide relevant materials further demonstrates Purdue's need for GE's documents and deposition.

Dated: November 23, 2022

Respectfully submitted,

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***COUNSEL FOR PLAINTIFF  
THE TRUSTEES OF PURDUE UNIVERSITY***

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on November 23, 2022, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system.

/s/ Halima Shukri Ndai